

# **EXHIBIT D**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

Amy Connelly, )  
Plaintiff, )  
 ) Civil Action No. 2:20-cv-00064  
v. )  
 )  
City of St. Albans, Vermont, )  
Gary Taylor, *individually and in his* )  
*official capacity as Chief of Police for* )  
*the City of St. Albans, Vermont,* )  
Jason Lawton, Zachary Koch, and )  
Michael Ferguson, *individually and in* )  
*their capacities as police officer for* )  
*the City of St. Albans, Vermont,* )  
Defendants. )

**DECLARATION OF JAMES F. CONWAY, III**  
**IN SUPPORT OF DEFENDANT MICHAEL FERGUSON'S**  
**MOTION FOR SUMMARY JUDGMENT**

I, James F. Conway, III, declare under penalty of perjury that the following statements are true and accurate and based on my personal knowledge:

1. My name is James F. Conway, III. I am an attorney at Monaghan Safar Ducham PLLC.
2. I am one of the attorneys representing Defendant Michael Ferguson in the above-captioned matter.
3. Attached hereto as Attachment 1 is a true and correct copy of a March 14, 2019 video of the City of St. Albans Police Department ("SAPD") hallway outside of the holding cells.
4. Attached hereto as Attachment 2 is a true and correct copy of a March 14, 2019 video of one of the SAPD holding cells.
5. Attached hereto as Attachment 3 is a true and correct copy of a March 14, 2019 body camera video of Sergeant Jason Lawton.



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6. Attached hereto as Attachment 4 is a true and correct copy of a March 14, 2019 body camera video of Officer Zachary Koch.
  7. Attached hereto as Attachment 5 is a true and correct copy of a March 14, 2019 video of the outside of the SAPD holding cells.
  8. Attached hereto as Attachment 6 is a true and correct copy Defendant Michael Ferguson's First Requests for Admission, dated and served May 6, 2021.
  9. As of the date of the filing of this Motion for Summary Judgment, Plaintiff had not responded to the Michael Ferguson's First Requests for Admission.
- I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 22<sup>nd</sup> day of June, 2021.

By: \_\_\_\_\_

  
James F. Conway, III, Esq.  
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